

March 14, 2019

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VIA ECFS

Marlene H. Dortch, Secretary
Office of the Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

RE: Notice of Ex Parte Presentation: *Rules and Regulations Implementing the Telephone Consumer Protection Act*, CG Docket No. 02-278; *Consumer and Governmental Affairs Bureau Seeks Comment on Interpretation of the Telephone Consumer Protection Act of 1991*, CG Docket No. 18-152

Dear Ms. Dortch:

On Tuesday, March 12, 2019, Gail Enda, President & Chief Executive Officer, American Airlines Credit Union; Faith Anderson, Senior Vice President and General Counsel, American Airlines Credit Union; Brenda Tristan, Government Relations Manager, American Airlines Credit Union; Brad Aspgren, Senior Vice President of Operations, American Airlines Credit Union, Bruce Chemel, Board Member, American Airlines Credit Union; Mitria Wilson, Senior Director of Advocacy and Counsel, Credit Union National Association (“CUNA”); and the undersigned, met with Zenji Nakazawa, Legal Advisor to Commissioner Ajit Pai, to discuss the Commission’s ongoing proceedings related to the Telephone Consumer Protection Act (“TCPA”).

Consistent with the points made in CUNA’s Petition for Declaratory Ruling, we urged the Commission to adopt an established business relationship exemption for informational calls to wireless phones, subject to reasonable, overall restrictions on call frequency.¹ We also noted that CUNA had joined the Chamber of Commerce Petition for Declaratory Ruling on the definition of an ATDS,² and reiterated CUNA’s support for defining the “called party” as the intended recipient

¹*In the Matter of Credit Union National Association Petition for Declaratory Ruling and Rules and Regulations Implementing the Telephone Consumer Protection Act*, CG Docket No. 02-278, Petition for Declaratory Ruling (filed September 29, 2017).

² U.S. Chamber Institute for Legal Reform *et al.*, Petition for Declaratory Ruling, CG Docket No. 02-278 (filed May 3, 2018).

of the call and for the establishment of reasonable methods of revocation of consent, consistent with CUNA's comments in the above-captioned proceedings.³

Please contact the undersigned if you have any questions.

Sincerely,

/s/ Michael H. Pryor

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cc: Zenji Nakazawa (via email)

MHP:KJS

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³ *Comments of the Credit Union National Association*, CG Docket Nos. 18-152, 02-278, (filed June 13, 2018); and *Comments of the Credit Union National Association*, CG Docket Nos. 18-152, 02-278, (filed October 17, 2018).